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7 Intervenor C. Prada

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
SANTA ANA

BY  
hc

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 LAURA HOFFMAN, an individual, ) Case No. SACV-06-571-AJG(MLGx)  
11 on behalf of herself and all others )  
similarly situated, ) **CLASS ACTION**

12 Plaintiff,

13 vs. )  
14 CITIBANK (SOUTH DAKOTA), ) **NOTICE OF OPPOSITION TO**  
15 N.A., and DOES 1 through 10, ) **DEFENDANT CITIBANK (SOUTH**  
inclusive, ) **DAKOTA), N.A. AND PLAINTIFF**  
16 ) **HOFFMAN'S EX PARTE**  
17 Defendants. ) **APPLICATION & PURPORTED**  
Date: none ) **STIPULATION TO EXTEND**  
Time: none ) **DEADLINE FOR OBJECTIONS, ETC.**

20 Ctrm: 10D  
21 )  
22 Assigned to the Honorable Andrew J.  
Guilford, Courtroom 10D  
23 )  
24 Action Filed: May 5, 2006  
25 )  
26 Trial Date: Not set  
27 )

1  
2 Settling Parties [Defendant Citibank (North Dakota), N.A. and Plaintiff  
3 Laura Hoffman are the "Settling Parties"] have filed a purported "Stipulation to  
4 Extend Deadline for Objections, etc." on or about November 12, 2010.

5 Objector Prada filed and served Objections in opposition to Settling  
6 Parties' proposed settlement on November 8, 2010.

7 Objector Prada's counsel was not contacted by Settling Parties about their  
8 "Stipulation" before it was filed with the Court. And, apparently, neither was  
9 counsel for the other objectors (Balla, Cesare and Bates--represented by the  
10 Law Offices of Darrill Palmer).

11 Thus, it is not a true stipulation by all litigatory participants in this case,  
12 but, rather, it is submitted, an improper ex parte application by Settling Parties.  
13

14 In any event, **Objector Prada opposes Settling Parties efforts to**  
15 **extend the objection date without a hearing** before this Court and asks that  
16 the scheduled final approval hearing, now set for December 13, 2010 at 10:00  
17 a.m., go forward as scheduled so that the issues raised by Objection may be  
18 heard and so that the Parties (including objectors) may benefit from hearing  
19 from the Court as to the propriety of the proposed settlement.

20  
21 DATED: November 15, 2010  
22

23 Respectfully submitted,

24 by /s/ Howard Strong   
25 Howard Strong, Attorney for Objector C. Prada  
26  
27  
28

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

I, the undersigned, am employed at the Law Offices of Howard Strong, Postal Box 570092, Tarzana, CA 91357-0092 in the County of Los Angeles.

On the date below, I served the foregoing document(s) described as:

**NOTICE OF OPPOSITION TO DEFENDANT CITIBANK (SOUTH DAKOTA), N.A. AND PLAINTIFF HOFFMAN'S EX PARTE APPLICATION & PURPORTED STIPULATION TO EXTEND DEADLINE FOR OBJECTIONS, ETC.**

       by placing true copies thereof enclosed in a sealed envelope or envelopes addressed as stated on the attached mailing list:

X by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

CLASS COUNSEL	DEFENSE COUNSEL	Objectors Balla, Cesare & Bates
Barry L. Kramer Law Offices of Barry L. Kramer 12428 Promontory Road Los Angeles, California 90049	Julia B. Strickland Stroock & Stroock & Lavan LLP 2029 Century Park East, 16th Floor Los Angeles, CA 90067	Darrell Palmer, Esq. Law Offices of Darrell Palmer 603 North Highway 1010, Ste A Solana Beach, CA 92075

BY PERSONAL SERVICE:        I delivered such envelope or envelopes by hand:

BY MAIL: X I deposited such envelope or envelopes in the United States mail at Los Angeles, California. The envelope or envelopes were mailed with first class postage thereon fully prepaid.

BY EXPRESS MAIL:        I deposited such envelope or envelopes in the United States mail at Los Angeles, California. The envelope or envelopes were mailed with Express Mail postage thereon fully prepaid and in an envelope provided by the United States Post Office for Express Mail service.

BY FAX        I faxed a copy of aforesaid document to Fax # at approximately on the date below.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Date: November 15, 2010

H. Strong: /s/ Howard Strong

